UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WISCONSIN

U.S. DISTRICT COURT EASTERN DISTRICT-WI

UNITED STATES OF AMERICA,

2025 JAN 22 P 1: 46

Plaintiff,

CLERK OF COURT

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Case No. 25-CR-

LI XING, a.k.a. "MR. LI," KAIYU HUANG, a.k.a. "SKINNY BOY," SHAWN M. SENTER, a.k.a. "SHAGGY," JASON A. WNUK, KEVIN M. EISENHAUER,

[18 U.S.C §§ 2(a), 922(o), 922(g)(1), 924(a)(2), 924(a)(8), & 924(c); 21 U.S.C. §§ 841(a)(1), 841(b)(1)(A), 841(b)(1)(C), 841(b)(1)(E), & 846]

SKYLAR V. TRUMBO, JOHN W. PERRY, and

SEALED

Defendants.

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

Beginning in at least January 2021 and continuing until in or about April 2022, in the State and Eastern District of Wisconsin and elsewhere,

> LI XING, a.k.a. "MR. LI," KAIYU HUANG, a.k.a. "SKINNY BOY," SHAWN M. SENTER, a.k.a. "SHAGGY," JASON A. WNUK, KEVIN M. EISENHAUER.

> > SKYLAR V. TRUMBO, JOHN W. PERRY, and

knowingly and intentionally conspired with each other and others, known and unknown to the Grand Jury, to possess with the intent to distribute and to distribute a mixture and substance containing 3,4-Methylenedioxymethamphetamine (MDMA), a Schedule I controlled substance, and a mixture and substance containing ketamine, a Schedule III controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), 841(b)(1)(C), and 841(b)(1)(E), and Title 18, United States Code, Section 2(a).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 12, 2022, in the State and Eastern District of Wisconsin,

JASON A. WNUK

knowingly distributed a mixture and substance containing ketamine, a Schedule III controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(E).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about February 21, 2022, in the State and Eastern District of Wisconsin,

JASON A. WNUK

knowingly and intentionally possessed with intent to distribute controlled substances.

2. The offense involved 10 grams or more of a mixture and substance containing lysergic acid diethylamide (LSD), a Schedule I controlled substance; and a mixture and substance containing ketamine, a Schedule III controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and 841(b)(1)(E).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 21, 2022, in the State and Eastern District of Wisconsin,

JASON A. WNUK

knowingly possessed a firearm in furtherance of the drug trafficking offenses charged in Counts One and Three of this Indictment.

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2(a).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 21, 2022, in the State and Eastern District of Wisconsin,

JASON A. WNUK

knowingly possessed a machinegun, that is, a Glock 17M 9mm, bearing serial number BENS974, with a machinegun-conversion device attached.

In violation of Title 18, United States Code, Sections 922(o) and 924(a)(2).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 10, 2022, in the State and Eastern District of Wisconsin and elsewhere,

SHAWN M. SENTER, a.k.a. "SHAGGY,"

knowingly and intentionally possessed with intent to distribute a mixture and substance containing 3,4-Methylenedioxymethamphetamine (MDMA), a Schedule I controlled substance; and a mixture and substance containing ketamine, a Schedule III controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 841(b)(1)(E).

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 10, 2022, in the State and Eastern District of Wisconsin,

SHAWN M. SENTER, a.k.a. "SHAGGY,"

knowingly and intentionally possessed with intent to distribute a mixture and substance containing 3,4-Methylenedioxymethamphetamine (MDMA), a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 10, 2022, in the State and Eastern District of Wisconsin,

SHAWN M. SENTER, a.k.a. "SHAGGY,"

knowingly possessed a firearm in furtherance of the drug trafficking offenses charged in Counts One and Seven of this Indictment.

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2(a).

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 10, 2022, in the State and Eastern District of Wisconsin,

SHAWN M. SENTER, a.k.a. "SHAGGY,"

knowingly possessed a machinegun, that is, a Glock 17C 9mm, bearing serial number EDL252, with a machinegun-conversion device attached.

In violation of Title 18, United States Code, Sections 922(o) and 924(a)(2).

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 10, 2022, in the State and Eastern District of Wisconsin, 1.

SHAWN M. SENTER, a.k.a. "SHAGGY,"

knowing he previously had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm which, prior to his possession of it, had been transported in interstate commerce, the possession of which was therefore in and affecting commerce.

The firearm is more fully described as a black/blue Model 17C Glock 9 mm, 2. bearing serial number EDL252, with a machinegun-conversion device attached.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 29, 2022, in the State and Eastern District of Wisconsin,

knowingly distributed a mixture and substance containing ketamine, a Schedule III controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(E).

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 4, 2022, in the State and Eastern District of Wisconsin,

knowingly and intentionally possessed with intent to distribute a mixture and substance containing ketamine, a Schedule III controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(E).

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 16, 2023, in the State and Eastern District of Wisconsin and elsewhere,

LI XING, a.k.a. "MR. LI," and **KAIYU HUANG**

knowingly distributed a mixture and substance containing ketamine, a Schedule III controlled substance.

In violation of Title 18, United States Code, Section 2(a) and Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(E).

COUNT FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 8, 2024, in the State and Eastern District of Wisconsin and elsewhere,

LI XING, a.k.a. "MR. LI," and KAIYU HUANG

knowingly distributed a mixture and substance containing ketamine, a Schedule III controlled substance.

In violation of Title 18, United States Code, Section 2(a) and Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(E).

FORFEITURE NOTICE

- Upon conviction of the controlled substance offenses alleged in Counts One to 1. Three, Counts Six and Seven, and Counts Eleven to Fourteen of this Indictment, the defendants shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the violation and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the offenses. The properties subject to forfeiture include, but are not limited to, approximately \$9,600 recovered from XX57 North 106th Street, Milwaukee, Wisconsin, 53225, on February 21, 2022.
- 2. Upon conviction of any offense in violation of Title 18, United States Code, Sections 922(g), 922(o), or 924(c), as set forth in Counts Four, Five, Eight, Nine and Ten of this Indictment, the defendants shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved in the offenses of conviction. The properties subject to forfeiture include, but are not limited to:
 - a. a Glock 45 9mm, bearing serial number BNWA275, recovered from XX57 North 106th Street, Milwaukee, Wisconsin, 53225, on February 21, 2022;
 - b. a Glock 17M 9mm, bearing serial number BENS974, with a Glock switch, recovered from XX57 North 106th Street, Milwaukee, Wisconsin, 53225, on February 21, 2022;
 - c. a Bersa Thunder 380, bearing serial number G48024, recovered from XX57 North 106th Street, Milwaukee, Wisconsin, 53225, on February 21, 2022;
 - d. a Glock 17 9mm, bearing serial number AUC207, recovered from XX57 North 106th Street, Milwaukee, Wisconsin, 53225, on February 21, 2022; and
 - a blue/black Model 17C Glock 9mm, bearing serial number EDL252, with a Glock auto-sear switch and an empty extended magazine, recovered from XX05 South 3rd Street, Milwaukee, Wisconsin, 53207, on March 10, 2022.

3. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be subdivided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, pursuant to 21 U.S.C. § 853(p).

A TRUE BILL:

United States Attorney